June 1, 1995

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: ET Docket No. 95-19, Equipment Authorization Requirements for Digital Devices

Gentlemen,

I would like to respectively submit these comments on the NPRM, FCC 95-46, for consideration. I submit these comments as a private citizen with twelve years experience in the FCC Class B field.

SUMMARY:

1) I fully support and agree with the DoC process as proposed in the NPRM. I also endorse the idea of a small logo to replace the FCC ID and related statements on the product labels. In addition, I would like to offer an alternative to the DoC for consideration.

2) I understand the reasons and the needs for test lab accreditation. I support this effort, and agree in principle with this concept. I do not, however support the NAVLAP program as it is currently implemented, and I would like to offer an alternative for consideration.

3) I consider the concept of "Modular Compliance" technically challenging from an emissions standpoint, and I would like to offer an amended version for consideration.

TEXT:

DoC

I welcome the DoC process as submitted by the FCC. The entire Personal Computer industry will realize the benefits of shorter time to market in conjunction with not pre-disclosing product information to the public prematurely. Due to the long lead time for User's Manuals, in conjunction with a common User's Manuals sometimes being utilized across a product line, I suggest that a statement be placed in the user's manual explaining how to obtain a copy of the DoC from the manufacturer. I also suggest that some form of notification to the FCC of product introduction by either written, or electronic notification. This will give the FCC a tool of understanding exactly what products are being introduced into the market, and where they are coming from (domestic product or offshore).

As an alternative to the proposed DoC, I would like to propose another approach. As stated in the NPRM, currently there is not a problem with

interference complaints from Information Technology "IT" equipment. This fact taken in conjunction with the emissions status of the point of sale computer products, leads one to conclude that perhaps the current Class B limits may be too strict. I propose that all IT equipment be classified as FCC Class A Verified equipment. This simple change would have all of the reduced time to market, and confidentiality benefits of the DoC program, with some other substantial benefits*. This change will also benefit the FCC as well, as the FCC would not be burdened with the task of developing, implementing, and refining a totally new process (DoC).

*(Please see "Class A Savings Analysis" at the end of this letter)

FCC LOGO

I fully support the idea of a small logo replacing the FCC ID and compliance statements that are currently required for product labels. I am currently finding it increasingly more difficult to find sufficient room on today's product labels for all of the worldwide compliance marks and statements. I appreciate the FCC leadership position on this issue and recommends a new, small, simple logo, possibly based on a NAFTA theme.

NAVLAP ACCREDITATION PROGRAM

I understand and support the idea and concept of test lab accreditation in principle. I find the current NAVLAP program too burdensome and invasive to be practical and viable in today's competitive Personal Computer market place.

As an alternative, I would like to offer the idea of the ISO 9000 program for consideration. The ISO 9000 program is recognized worldwide as an excellent means of obtaining top quality into the applied fields. I feel the ISO 9000 program would accomplish the goals of verifying that quality data is coming from quality labs, without some of the complications involved in the current NAVLAP program (confidentiality of personnel records for example).

MODULAR COMPUTER COMPLIANCE

I would like to submit the following approach for the issue of Modular Computer Compliance for consideration:

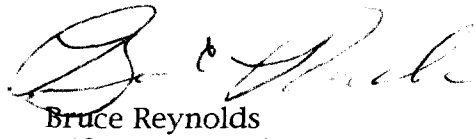
I suggest that Modular Components (power supplies, circuit boards, and enclosures) be tested to the current Class B limits and have enclosures marked with the highest performance board approved for that enclosure ("Compliance verified up to 100MHz CPU", for example). I realize that these Modular Components might find their way into non-tested combinations that may exceed the Class B limits. Given the probable emission level compromise from the Modular Compliance approach, I recommend the Modular Compliance procedures be tied to "traditional" full Computer Systems being subject to the FCC Class A Verification rules. This approach would give Modular Computer Components no stricter requirements than are currently in place, plus gives the option and incentive, to test completed Computer Systems as Class A. Having all IT equipment systems classified as Class A, will have additional benefits as well (Please see "Class A Savings Analysis" below).

CLASS A SAVINGS ANALYSIS

Over the years, I have found that getting that last 3-6dB of emissions reduction from Computer Systems adds significant cost (for additional ferrites, filters, spring fingers, gaskets etc.), in conjunction with increased product development cycle weeks, and/or months of additional development time.

My conservatively estimates for a complete Personal Computer System (CPU, Monitor, and Peripherals) the potential cost savings per computer system at $10-$20 in direct product costs. The current Class B Computer Market represents approximately twenty million systems per year, with a potential yearly savings of $200-$400 million. With these direct savings passed along to consumers ($200-$400 million), plus the addition of the time to market savings estimated by the FCC at $250 million, the total combined savings for industry and consumers could exceed $1 billion annually.

Respectfully submitted,



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